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ORS hereby provides the following Supplement to its Pre-Hearing Brief filed with the Commission on October 26, 2018 to comply with Hearing Officer Directive Order No. 2018-149-H requiring that a “final list of non-pre-filed witnesses must also be specifically listed in the pre-hearing brief, along with a statement of the substance of the testimony being sought from each such witness.”

ORS is including Ken Browne and Carlett Walker in the following list of non-prefiled Witnesses, even though it is ORS's present intent to have both appear at the hearing as prefiled witnesses on behalf of ORS. ORS desires to use their depositions as prefiled testimony, and as per normal course, state that if the same questions were asked, their answers would remain the same. ORS either has or is issuing trial subpoenas for their attendance. ORS is or will additionally be issuing trial subpoenas for other non-prefiled witnesses. Due to Ty Troutman being at a greater distance than 100 miles from the hearing, ORS seeks to submit his deposition pursuant to SCRCR Rule 32(a)(3)(B). Below are listed the witnesses and/or depositions ORS intends to present at the hearing in these dockets, including a summary of their testimony:

1. Ken Browne, former SCE&G employee. Mr. Browne testified in his deposition that he was instructed not to share information with ORS regarding his work reviewing the Estimate At Completion costs provided by the Consortium. Mr. Browne's testimony will support ORS's position that the Company knew the costs included in its 2015 Petition for Modification were false and misleading. He supports Mrs. Walker's testimony that the costs presented to the Commission were known to be incorrect.
2. Carlette Walker, former SCE&G employee. Mrs. Walker is known to this Commission and testified in the 2015 proceeding. Her testimony further supports ORS's position that SCE&G knew the information presented to the Commission in 2015 was false and misleading.
3. Ty Troutman, Bechtel. Mr. Troutman verified in his deposition that Bechtel's assessment of the schedule was accurate, and that he had conversations directly with Mr. Byrnes. Mr. Troutman's deposition reinforces ORS's position that SCE&G deliberately and intentionally sought to cover up and hide the schedule assessment.
4. Iris Griffin, SCE&G CFO. Mrs. Griffin testified in the federal court proceeding that ORS seeks to include as part of its case. She is a hostile witness.
5. Marion Cherry, VCS Site Supervisor, Santee Cooper

A significant number of exhibits relied upon by ORS witness Gary Jones were created by Marion Cherry. Given that SCE&G intends to object to the vast majority of all documents, even those created or produced by SCE&G, ORS seeks to have Mr. Cherry authenticate documents, correspondence that is relied upon by ORS.

6. Michael Crosby, Senior Vice President, Nuclear Energy, Santee Cooper

A significant number of exhibits relied upon by ORS witness Gary Jones were created by Mr. Crosby. Given that SCE&G intends to object to the vast majority of all documents, even those created or produced by SCE&G, ORS seeks to have Mr. Crosby authenticate documents, correspondence that is relied upon by ORS.

7. Westinghouse Electric Company ("WEC") Rule 30(b)(6) witness(es), by deposition

The Westinghouse depositions are helpful to provide context and corroboration.

8. Terry Elam, Project Controls Officer, WEC, by deposition

Mr. Elam had responsibility for the schedule.

Additional Non-Prefiled Witnesses ORS may call if necessary:

In large part, ORS is including these witnesses because SCE&G has filed more than 100 objections to documents they produced, documents Santee Cooper produced, or documents obtained through discovery of other non-parties. For purposes of ensuring our ability to respond to such objections, certain witnesses identified below can authenticate or overcome various objections to the admissibility of the email correspondence or other documents.

1. Kevin Marsh, former Chief Executive Officer and President, SCANA Corp.

SCE&G intends to object to the vast majority of all documents, even those created or produced by SCE&G, ORS seeks to have Mr. Marsh authenticate documents, correspondence that is relied upon by ORS that is from or to Mr. Marsh, including press releases and other public SCANA corporate documents of which Mr. Marsh in his position as CEO would have had to authorize.

2. Stephen Byrne, former Chief Operating Officer, SCANA

SCE&G intends to object to the vast majority of all documents, even those created or produced by SCE&G, ORS seeks to have Mr. Byrnes authenticate documents, correspondence that is relied upon

by ORS that is from or to Mr. Byrnes, including documents of which Mr. Byrnes in his position as COO would have had to authorize.

3. SCE&G Rule 30(b)(6) witness(es)

To rebut or impeach SCE&G witnesses as necessary.

4. Lonnie Carter, former President of Santee Cooper

SCE&G intends to object to the vast majority of all documents, even those created or produced by Santee Cooper, ORS seeks to have Mr. Carter authenticate documents, correspondence that is relied upon by ORS that is from or to Mr. Carter, including documents of which Mr. Carter in his position as an officer of Santee Cooper would have had to authorize.

5. Ronald A. Jones, former Vice President for New Nuclear Operations, SCE&G

SCE&G intends to object to the vast majority of all documents, even those created or produced by SCE&G, ORS seeks to have Mr. Jones s authenticate documents, correspondence that is relied upon by ORS that is from or to Mr. Jones, including documents of which Mr. Jones in his position would have had to authorize.

6. George Wenick, Attorney for SCE&G

SCE&G intends to object to the vast majority of all documents, even those created or produced by SCE&G, ORS seeks to have Mr. Wenick authenticate documents, correspondence that is relied upon by ORS that is from or to Mr. Wenick, including documents of which Mr. Wenick in his position would have had to authorize.

7. Jeff Hawkins, Fluor

For the purposes of rebutting or impeaching SCE&G witnesses as necessary.

8. Gary Flowers, Flour

For the purposes of rebutting or impeaching SCE&G witnesses as necessary.

9. Dukes Scott, former Executive Director, ORS

To rebut SCE&G witnesses contention that SCE&G fully informed ORS as to EAC costs for 2015 and the Bechtel schedule assessment.

10. Robert McKie, IT, SCANA

For the purpose of informing the Commission that SCE&G did not retain documents.

11. Any Witness identified by any other party or intervenor in the Consolidated Docket

Respectfully submitted,



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